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OUTGOING LTR. NO.

DOE ORDER # 4700.1

95 RFO 1570

EG&G ROCKY FLATS

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February 9, 1995

95-RF-01570

Jessie M. Roberson
Assistant Manager for
Environmental Restoration
DOE/RFFO

SUBMITTAL OF ENFORCEABLE PROJECT MILESTONES AND REVISED PROJECT SCHEDULE FOR OPERABLE UNIT (OU) 15, INSIDE BUILDING CLOSURES, TO THE DEPARTMENT OF ENERGY/ROCKY FLATS FIELD OFFICE (DOE/RFFO) - SGS-050-95

Action: Submittal of enforceable project milestones and revised project schedule to the Colorado Department of Health and Environment and the Environmental Protection Agency (EPA) by DOE/RFFO

The purpose of this letter is to transmit the enforceable project milestones and revised project schedule to DOE/RFFO.

This revised schedule has been developed in compliance with the revised approach to closure of OU 15 and as requested by the OU 15 Phase I RCRA [Resource Conservation and Recovery Act] Facility Investigation/Remedial Investigation (RFI/RI) Report approval letter. The referenced approval letter stated that the radiological program, currently in place at Rocky Flats, must be "institutionalized" and that "DOE must propose milestone dates for the activities which will bring closure to this operable unit." The requested milestones and proposed dates are listed below along with key assumptions. Further, the revised project schedule is attached for DOE/RFFO's use.

The basis of the revised schedule is duration-based. Turnaround times for DOE/RFFO and the regulatory agencies were extracted from the Interagency Agreement and used throughout the schedule. Specifically, DOE/RFFO shall have 42 working days for each task, and the regulatory agencies have 35 days for their review periods. The basis directs that each agency will have the scheduled time no matter what delay is caused by the previous activity. The duration-based basis of scheduling then dictates day-for-day extensions for all delays incurred. An example of this basis follows: EPA takes 40 days to review the Draft Proposed Plan. EPA therefore causes a five-day delay (40 - 35 = 5). DOE/RFFO will then have 47 days from receipt of EPA comments to complete the next task (42 + 5 = 47). Thus, DOE/RFFO has received a five-day extension due to EPA-caused delays. This scenario works the same for DOE/RFFO-caused delays.

Proposed Milestones

- Submit Certification of RCRA Clean Closure March 31, 1995
- Submit Draft Proposed Plan/Draft RCRA Permit Modification March 31, 1995
- Submit Final Proposed Plan/Draft RCRA Permit Modification July 19, 1995
- Submit Draft Corrective Action Decision/Record of Decision (CAD/ROD) with Responsiveness Summary November 14, 1995
- Submit Final CAD/ROD February 29, 1996

ACTION TRACKING

FILE

CORRES. CONTROL

ADMIN RECORD

PROJECT FILE

PATS

CLASSIFICATION

UCNI

UNCLASSIFIED

CONFIDENTIAL

SECRET

AUTHORIZED CLASSIFIER

SIGNATURE

9-95

OK For Public Release

IN REPLY TO REP CC NO:

107-RF-95

ACTION ITEM STATUS:

PARTIAL/OPEN

CLOSED

LETTER APPROVALS:

ALP

ORIGINATOR & TYPIST INITIALS

RTD/Alm

ADMIN RECORD

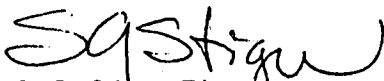
A-OU15-000197

Jessie M. Roberson
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Key Assumptions

- DOE/RFFO and the regulatory agencies will support the revised schedule.
- All delays in submittal or review will be considered as day-for-day extensions for the succeeding activities and milestones.
- Dispute durations will be considered day-for-day extensions.
- The approach for closure once approved in the Draft Proposed Plan will not change.
- The public involvement period will not exceed 60 calendar days (42 working days).

If you have any questions regarding this correspondence, please contact Rich Ray at telephone extension 8557.










S. G. Stiger, Director
Environmental Restoration Program Division
EG&G Rocky Flats, Inc.

RJR:ilm








Orig. and 1 cc – J. M. Roberson

Attachment:
As Stated







cc:
W. Fitch – DOE/RFFO
M. N. Silverman – “ ”

Project: 001E:INSIDE BUILDING CLOSURES Date: 2/8/95	 	Progress 	
Critical Noncritical	 	Critical Milestone 	Summary Relief Up

Page 1

Project OUTSIDE BUILDING CLOSURES Date: 2/18/95		Progress 	Summary 	
	Critical Noncritical		Critical Milestone 	Roll Up 

Page 2

Project: 0015 INSIDE BUILDING CLOSURES						
Date: 2/8/95						
	<u>Critical</u>		<u>Progress</u>		<u>Summary</u>	
	<u>Noncritical</u>		<u>Critical Milestone</u>		<u>Roll Up</u>	

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